



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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May 8, 2024

VIA E.C.F.

Honorable Jesse M. Furman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 11201

Re: Bahadoran v. City of New York et al.
21-cv-04884 (JMF)

Your Honor:

I am a Deputy Chief in the Special Federal Litigation Division of the New York City Law Department and supervising the above-referenced matter of behalf of defendants. I write to respectfully request a 30 day extension of the deadline to submit the Joint Pretrial Order and other associated pretrial materials from May 24, 2024 to June 24, 2024. We have conferred with Plaintiff's counsel and they take no position on this request.

As the Court is already aware, this is a complex case which concerns a police shooting resulting in serious injuries to plaintiff (partial paralysis). The parties have spent a substantial amount of time and effort exploring potential settlement which was ultimately unsuccessful. We are now in the process of assigning one of our trial team attorneys to this case. Our trial team attorney is currently engaged in a death in custody trial that began yesterday and is expected to last three weeks. That attorney would need sufficient time to familiarize themselves with this case so they can meaningfully contribute to the pretrial submission. In addition, because many of the pretrial documents are to be jointly submitted the current schedule leaves very little room for the parties to prepare their respective portions of those submissions and have a productive dialogue and exchange about same.

Accordingly, it is respectfully requested that the Court grant a 30 day enlargement of time, until June 24, 2024, to submit the Joint Pretrial Order and other associated pretrial materials in this matter.

We thank the Court for its consideration of this request.

Respectfully submitted,

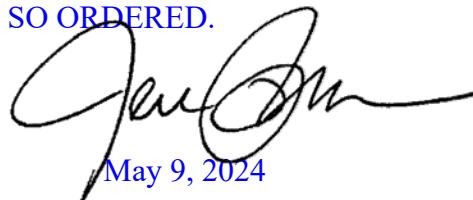
s/ Mary O'Flynn

Deputy Chief
Special Federal Litigation

cc: All counsel of record (by E.C.F.)

Application GRANTED. But given that more than six months have passed since the Court ruled on Defendants' motion for summary judgment, no further extensions will be granted. The Court will set a trial date upon the filing of a proposed JPTO; the parties should be prepared to try the case as soon as two weeks thereafter. The Clerk is directed to terminate ECF No. 88.

SO ORDERED.



May 9, 2024